REMARKS

In the Office Action of October 17, 2006, claims 1-24 were rejected under 35 U.S.C. 103(a) as unpatentable over Kavner (U.S. 6,366,947) and Peckover (U.S. 6,119,101).

Applicants' invention is directed to a method for obscuring user access patterns in a computer network. An example of the kind of access patterns that are obscured by the present invention is the "click data" that can be tracked as a user visits a server computer with his or her browser.

In accordance with the invention, user access patterns are obscured in two ways. First, some access patterns are never made available to the server computer. This is accomplished by using a cache memory to store some of the information requested by the user computer. While the cache memory ultimately gets its information from the server computer, the cache memory will be able to service some of the user computer's repeated requests from its own memory contents and will not have to access the server computer. As a result., for these repeated requests, no access is made to the server computer and these parts of the user's access patterns are never made available to the server computer. See page 7, line 33 to page 8, line 11, of the specification.

Where the requested information is not available in the cache memory, a second technique is employed to obscure the user's access patterns to the server computer. In particular, the request is edited to obscure user identity information. See, step 165 of Fig. 2 and page 8, line 13, of the specification. As a result, anyone attempting to trace the request will have difficulty linking it to the user computer.

These features of applicants' invention are captured in the language of the claims. For example, method claim 1 requires a user request for information from another network member to be routed first to a cache memory and for the requested information to be provided if the cache

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memory contains the information without releasing the request to the network member. Further, claim 1 requires that if the cache memory does not contain the requested information, user identity information in the request is edited to obscure such information. before the edited request is released to the network member.

Independent claims 11 and 19 which are directed to a computer program and to a system, respectively, are similar.

In rejecting the claims, the Examiner relies on Kavner for everything except details relating to the editing of user identity information to obscure the identity information. As its title suggests, Kavner is directed to a method for accelerating a user's network interaction. It does this with a variety of techniques: by storing downloads from a website in a local cache (Col. 4, lines 44-59), by drawing subsequent accesses to that website from the local cache while updating the cache from the website in background mode (Col. 5, lines 30-53), by pre-fetching hyperlink information before the hyperlink is selected (Col. 5, lines 54-63), by filtering out ads (Col. 6, lines 28-62 and by filtering out cookies (Col. 6, line 63 to Col. 7, line 25).

Peckover is relied upon only for the teaching of details about the editing of user information to obscure identity information. Peckover discloses a system of software agents for representing buyers and sellers in ecommerce including a consumer personal agent, a provider personal agent, a decision agent and a demand agent. As stated at Col. 8, lines 35 to 37 of Peckover, "[a] software agent is a software entity that is capable of performing certain delegated electronic actions (including holding information) on behalf of a user or another agent." The structure of the personal agent is depicted in Figs. 4A-4D; that of the decision agent is depicted in Fig. 6; and that of the demand agent in Fig. 7. As will be apparent from these illustrations and the description of them at Col. 18, line 30 to Col. 22, line 55, these software agents are elaborate

detailed software programs for providing a variety of functions that automate a shopping process while protecting the user from unwanted solicitations.

Contrary to the Examiner's assertion, Kavner and Peckover are not in the same field of endeavor. Kavner is directed to a method of accelerating a user's network interaction, a typical issue in operating a computer system. Peckover, on the other hand, is an electronic commerce system and more particularly an automated shopping system.

There is no suggestion in Kavner or Peckover that the two references be combined to produce the method, software program, or the system of the present invention. Kavner's whole interest is in accelerating the user's network interaction. He does this using, among other things, a local cache in substantially the same way local caches have been used for years. However, he makes no suggestion that the local cache be combined with any sort of process for obscuring the identity of the user who is interacting with the network. Likewise, Peckover fails to suggest anything more than an elaborate system of interacting software agents. In particular, Peckover fails to suggest that the software agents be combined with a cache and that the cache be used to enhance the operation of Peckover's system.
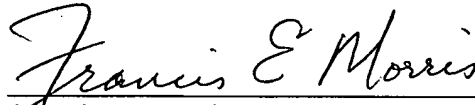
In the absence of any suggestion to combine Kavner and Peckover, these references do not suggest applicants' method recited in claim 1 of routing a user's request for information to a cache memory, providing the requested information if it is available in the cache, obscuring user identity information if the requested information is not available, releasing the request to the network with the obscured identity information, receiving the requested information and updating the cache. Likewise, the references do not suggest software program claim 11 and system claim 19.

For these reasons, independent claims 1, 11 and 19 are patentable over the art cited.

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Dependent claims 2-10, 12-18 and 20-27 are believed patentable for the same reason claims 1, 11 and 19 are patentable. Dependent claims 2, 3, 12, 13, 20 and 21 are believed patentable for the additional reason that they teach the use of an additional cache memory in the method, program and system of the present invention. In rejecting these claims, the Examiner relies on Col. 13, lines 46-57 of Kavner. However, these lines do not disclose the use of two cache memories as recited in these claims.

In light of the above remarks, the Applicant respectfully requests that the Examiner reconsider this application with a view towards allowance. The Examiner is invited to call the undersigned attorney if a telephone call could help resolve any remaining items.

Respectfully submitted,

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